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January 22, 2025

**BY ECF**

The Honorable Lorna G. Schofield  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Cypress Holdings, III, L.P. v. Hall*, No. 22-cv-1243 (LGS)  
*Sport-BLX v. Salerno, et al*, 22-cv-08111 (LGS)

Dear Judge Schofield:

We represent Sport-BLX, Inc. ("Sport-BLX"), Sport-BLX Securities Inc. ("Sport-BLX Securities"), Clinton Group, Inc. ("Clinton Group"), George Hall, Mr. Johnson and Mr. Baez (together the "Sport-BLX Parties") in the above-referenced action. I write today concerning the next set of filings due in the cross-summary judgment briefing that is occurring in the above referenced matter.

Pursuant to the Court's Rule III (B)(3), please accept this correspondence as a request to exceed the limitations contained in that individual rule. Specifically, we request leave to file no more than eight additional exhibits. At least three of these exhibits will be audio files. Additionally, one exhibit will be deposition excerpts for a deposition transcript that has already been submitted pursuant to this Court's individual rules (Stecklow Exhibit 63). Lastly, we would like to add back in to two distinct exhibits, an additional page. This would be in one of our moving exhibits (Stecklow Exhibit 61), and one of Mr. Dudelson's exhibits (Dudelson Exhibit 12). For ease of reference, we could file these new exhibits, each with one additional page, as Stecklow Exhibit 61A and Dudelson Exhibit 12A. Overall, the total pages of all of the new exhibits, including the deposition excerpts, would be less than twenty pages.

Several reasons support the necessity of our request. First, we are filing both oppositional (defensive) and reply (offensive) motions for summary judgment in one briefing. Second, as the Court is aware, this motion was filed on behalf of three distinct legal teams representing ten different parties.

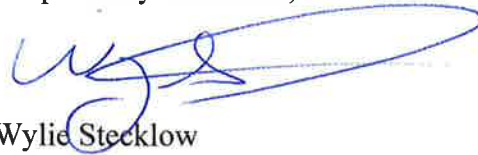
Second, in our joint motion papers, the ten parties represented by three teams moved to dismiss six of plaintiff's nine remaining claims. In addition, the Sport-BLX parties moved on three affirmative claims (fraud, 10b and fiduciary duty). Out of necessity, while trying to keep our arguments concise, our request for summary judgment has required identifying the indisputable record evidence (which is legion) proving (or disproving) each element of each claim. We have considerably narrowed the evidence for the Court to consider. There have been

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16 distinct parties which have made produced 55,276 documents with a combined total of 351,965 pages in this litigation (see page 3).

This letter request to expand the number of Exhibits which may be submitted to a total of no more than eight additional exhibits is made on behalf of all of the defendants. All parties, including Plaintiffs, consent to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Wylie Stecklow', with a large, sweeping loop at the end.

Wylie Stecklow